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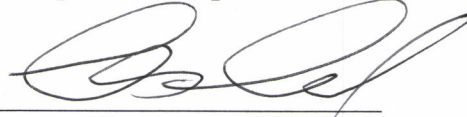
Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: Petition for Rule Making  
Alto, Texas (Channel 230C2)

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my  
Petition for Rule Making proposing to add Channel 230C2  
at Alto, Texas.

Respectfully submitted,



Charles Crawford  
2215 Cedar Springs Rd., #1605  
Dallas, Texas 75201  
[ccrawfordradio@aol.com](mailto:ccrawfordradio@aol.com)  
(214) 709-1605

Alto Cover

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

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In the Matter of )  
 )  
Amendment of 73.202(b) ) MB Docket No. \_\_\_\_\_  
FM Table of Allotments ) RM-  
FM Broadcast Stations )  
(Alto, Texas )

To: Office of the Secretary  
Attn: Chief, Audio Division,  
Media Bureau

**PETITION FOR RULE MAKING**

Charles Crawford hereby requests the allotment of Channel 230C2 to Alto, Texas,<sup>1</sup> as that community's first local transmission service. The following summarizes the changes requested in this Petition:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Alto, TX	-----	230C2
Shreveport, LA (KXKS)	229C	229C0

In order to allot Channel 230C2 to Alto, Texas, KXKS FM, Channel 229C at Shreveport, Louisiana must be reclassified from a class C to a class C0. (See, Attachment A, Request to Reclassify Statement)

**Alto, Texas qualifies as a "community" for FCC allotment purposes.**

Petitioner respectfully submits that the public interest would be served by allocating Channel 230C2 to Alto, Texas as that community's first local service. Alto is an incorporated community in Cherokee County, Texas. As

<sup>1</sup> Pursuant to *Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, 21 FCC Rcd 14212 (2006) ("*Streamlining R&O*"), Charles Crawford is contemporaneously filing a Form 301 application for this proposal along with the requisite filing fee. Should this channel be allotted to Alto, Texas, Charles Crawford hereby states that he will construct the facility specified in the Form 301.

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List ABCDE

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of the 2010 US Census, Alto had a population of 1,225 people.<sup>2</sup> Alto has its own post office<sup>3</sup>, city hall<sup>4</sup>, volunteer fire department<sup>5</sup>, zip code<sup>6</sup>, school district<sup>7</sup>, Chamber of Commerce<sup>8</sup> and police department<sup>9</sup>. As of January 2010, the Texas State Comptroller reported 68 businesses in Alto.<sup>10</sup> Additionally, Alto has over nine churches.

Alto is a community that is certainly deserving of a first FM service. "Local radio stations play an important role in their communities, providing local news, information and entertainment to residents, and generally serving as good corporate citizens in the local community life. This is particularly true in smaller towns where the radio stations are limited in number. Yet there are still rural areas of our country that do not have even a local radio station."<sup>11</sup> The proposed channel 230C2 will provide additional diversity and an outlet for local self-expression to Alto residents and therefore is in the public interest.

#### **Channel 230C2/ Alto, Texas**

Attached hereto is a channel study confirming that Channel 230C2 can be allocated to Alto, Texas, consistent with Section 73.207 of the Commission's Rules<sup>12</sup> with respect to all existing and proposed domestic allotments and facilities, provided that KXKS, channel 229C is reclassified to 229C0. (See, Attachment B) A 70 dBu signal can be provided to Alto from the proposed reference coordinates. Also note that KAGZ, Channel 230A/Burke, Texas filed for their license to cover for Channel 249A/Burke, Texas on September 2, 2015.

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<sup>2</sup> American FactFinder, (<http://factfinder.census.gov>). United States Census Bureau.

<sup>3</sup> Alto Post Office, 2201 Cooper Street, Alto, Texas 75925 (936) 858-4600.

<sup>4</sup> Alto City Hall, (936) 858-4711.

<sup>5</sup> Alto Volunteer Fire Department, (936) 858-4444

<sup>6</sup> Alto, Texas zip code - 75925.

<sup>7</sup> Alto Independent School District, (936) 858-7100.

<sup>8</sup> Alto Chamber of Commerce, (936) 858-1000.

<sup>9</sup> Alto Police Department, (936) 858-2221.

<sup>10</sup> Texas Almanac 2012-2013, published by Texas State Historical Association, page 421.

<sup>11</sup> Statement of Commissioner Kevin J. Martin, MM & O, MM Docket 99-240, released May 20, 2004.

<sup>12</sup> 47 C.F.R. 73.207.

Reference coordinates for Channel 230C2 at Alto, Texas are:

31 32 24.0 N

95 13 49.0 W

I hereby certify that should this petition be granted and Channel 230C2 is allotted to Alto, Texas as specified in my petition and in my Form 301 for this channel which I have simultaneously electronically filed with this Petition for Rule Making along with the requisite Form 301 filing fee, I will participate in the auction for the channel.

The factual information provided in these Comments is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Charles Crawford', with a long horizontal stroke extending to the right.

Charles Crawford  
2215 Cedar Springs Rd., #1605  
Dallas, Texas 75201  
[ccrawfordradio@aol.com](mailto:ccrawfordradio@aol.com)  
(214) 709-1605

October 9, 2015

Alto Petition

**Attachment A**

(Request to Reclassify Statement

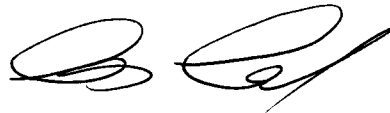
Charles Crawford  
2215 Cedar Springs Rd., #1605  
Dallas, TX 75201

Petition for Rulemaking  
FM Channel 230C2  
Alto, Texas  
October 9, 2015

**Attachment A**  
Request to Reclassify  
Station KXKS (FM), Shreveport, Louisiana  
Pursuant to MM Docket 98-93

Radio Station KXKS (FM), Shreveport, Louisiana is licensed to Townsquare Media Shreveport License, LLC, C/O Townsquare Media, Inc., 240 Greenwich Avenue, Greenwich, CT 06830. (Facility ID 46982), FCC File No. BLH-19840607CO. The facility operates with a power of 95 kilowatts with center of radiation 308 meters height above average terrain. The above captioned Docket 98-93 provides the mechanism to automatically downgrade a Class C facility to Class C0 when a demand is made for the spectrum, as is the case here. Charles Crawford respectfully requests that the license of Radio Station KXKS (FM) be modified to specify operation on FM Channel 229C0 instead of on FM Channel 229C in accordance with the above docket which provides for such downgrades when a demand for the unused spectrum is made, as is the case here.

Charles Crawford, the proponent of Channel 230C2/ Alto, Texas, in accordance with the above docket, formally requests that the Commission reclassify Radio Station KXKS (FM) as a Class C0 facility. Charles Crawford certifies that no alternative channel is available for the service he proposes at Alto, Texas as is proposed in the Petition for Rulemaking. A copy of this Petition for Rule Making is being served on Townsquare Media Shreveport License, LLC as is required in the above Docket.



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Charles Crawford

**Attachment B**

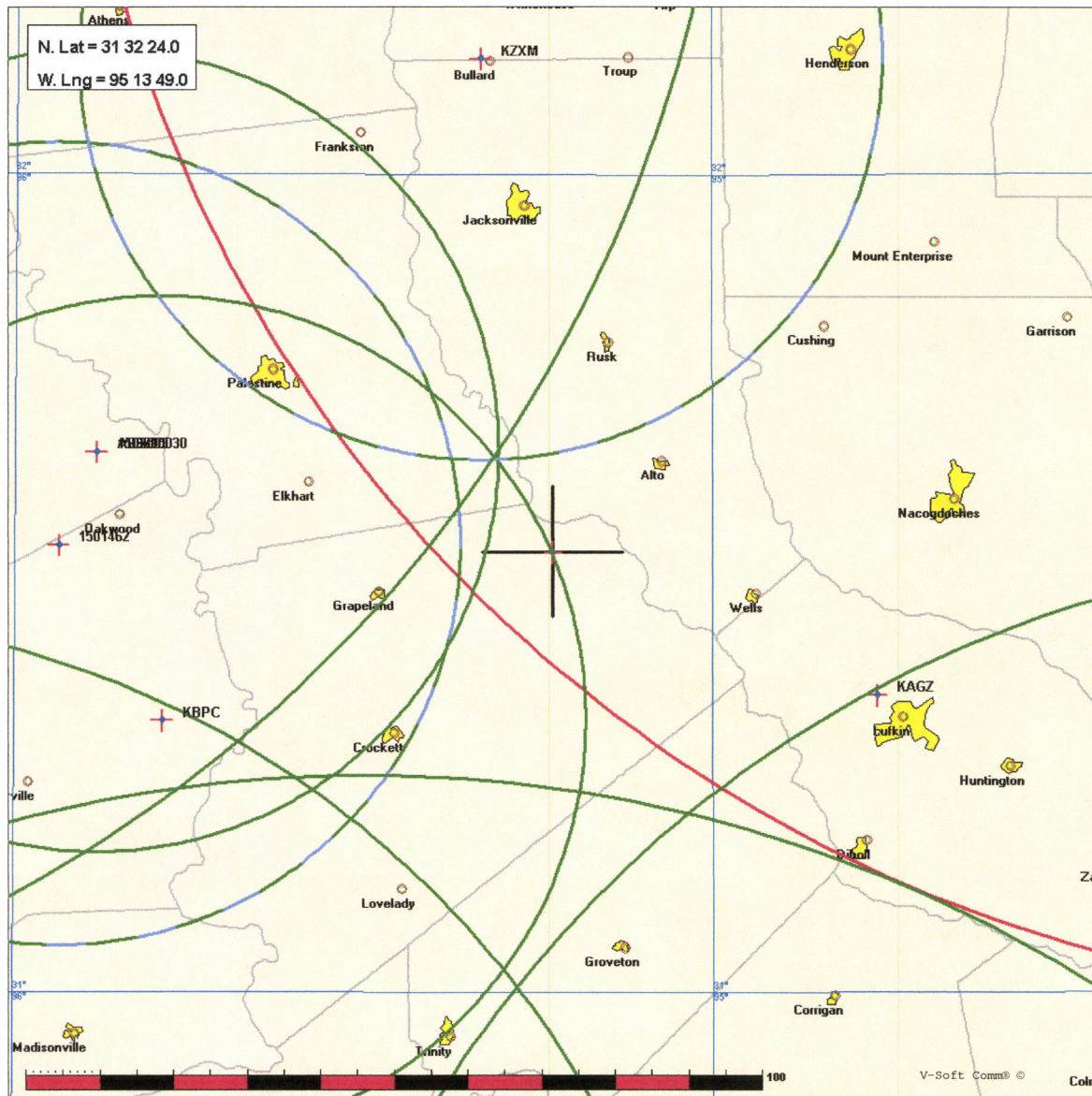
(Channel Study for 230C2 at Alto, Texas



CH 230 C2 93.9 MHz

Current Spacings to 3rd Adj.

Townsquare Media Shreveport License, LLC



Data Date:09-15-15				Job Date:10-06-15					
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin	
KAGZ	% 230A	LIC	Burke	TX	113.7	48.16	165.5	-117.3	
KXKS-FM	229C	LIC	Shreveport	LA	43.8	176.11	187.5	-11.4	
KBPC	228C2	LIC	Crockett	TX	246.7	57.63	57.5	0.13	
AP6290	233A	APP	Oakwood	TX	282.5	63.24	54.5	8.7	
AU9815030	233A	VAC	Oakwood	TX	282.5	63.24	54.5	8.7	
1502503	233A	RSV-A	Oakwood	TX	282.5	63.24	54.5	8.7	
1501462	233A	APP-N	Oakwood	TX	271.0	66.94	54.5	12.4	
KZXM	232A	LIC-Z	Bullard	TX	351.8	67.66	54.5	13.2	
KLNO	231C	LIC	Fort Worth	TX	305.9	201.27	187.5	13.8	
KQBT	229C	LIC-D	Houston	TX	186.6	219.38	187.5	31.9	
KQXY-FM	231C1	LIC	Beaumont	TX	143.1	196.96	157.5	39.5	
KLTR.C	231C2	CP	Hempstead	TX	218.0	174.92	129.5	45.4	

RSV-R, reserved, needs protection, RSV-A, allocation, does not if a CP or LIC has been granted.  
All separation margins include rounding

% =Station Fails minimum 73.215 spacings



### **CERTIFICATE OF SERVICE**

I, Charles Crawford, do hereby certify that copies of the foregoing Petition for Rule Making have been served by United States mail, postage prepaid this 9<sup>th</sup> day of October, 2015, upon the following:

Ms Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554  
(Federal Express)

Townsquare Media Shreveport License, LLC  
C/O Townsquare Media, Inc.  
240 Greenwich Avenue  
Greenwich, CT 06830

A handwritten signature in black ink, appearing to be 'Charles Crawford', written over a horizontal line.

Charles Crawford